

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

FRONTIER COMMUNICATIONS
CORPORATION, *et al.*¹

)
)
) Chapter 11

)
) Case No. 20-22476-mg

)
) (Jointly Administered)
)
)

**JOINT STIPULATION AND ORDER BETWEEN MOVIE COMPANY CLAIMANTS
FUTURE WORLD ONE, LLC; GROOVE TAILS PRODUCTIONS, LLC; AND
DEBTOR**

1. WHEREAS, on April 14, 2020, Frontier and certain of its direct and indirect subsidiaries and affiliates (collectively, “Debtors”) voluntarily filed petitions under Chapter 11 of the United States Bankruptcy Code in the Southern District of New York, jointly administered under Case No. 20-22476 (the “Bankruptcy Case”);

2. WHEREAS, on August 21, 2020 Debtors filed their *Fifth Amended Joint Plan of Reorganization of Frontier Communications Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [ECF No. 984] ((the “Plan”) in the Bankruptcy Case;

3. WHEREAS, on August 27, 2020, the Bankruptcy Court entered an Order in the Bankruptcy Case confirming the Plan;

4. WHEREAS, on September 22, 2020, Future World One, LLC filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179,167 based on theories of secondary copyright infringement with respect to one movie – *Future World* (the “Future World Work”) [Claim No. 2856] (the “Future World Claim”);

¹ Due to the large number of debtor entities in these chapter 11 cases, for which joint administration has been granted, a complete list of the debtor entities and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://cases.primeclerk.com/ftc>. The location of the Reorganized Debtors’ service address for purposes of these chapter 11 cases is: 50 Main Street, Suite 1000, White Plains, New York 10606.

5. WHEREAS, on September 22, 2020, Groove Tails Productions, LLC filed a proof of claim in the Bankruptcy Case asserting a general unsecured claim in the amount of \$179,167 based on theories of secondary copyright infringement with respect to one movie – *Bent* (the “Bent Work”) [Claim No. 2862] (the “Bent Claim”);

6. WHEREAS, on April 30, 2021, the Effective Date of the Plan occurred, and the Plan was consummated; and

7. WHEREAS, pursuant to Fed. R. Bankr. P. 7041 and Fed. R. Civ. P. 41(a)(1)(A)(ii) and/or 41(a)(2), Future World One, LLC, Groove Tails Productions, LLC and Debtors (collectively, “Parties”) stipulate to the dismissal of the Future World Claim and Bent Claim and all known and unknown claims between the Parties with prejudice, with each Party to bear its own costs and attorneys’ fees. In the interest of clarity, the parties further stipulate that no Party will seek recovery of costs or attorneys’ fees against the other incurred in this contested proceeding.

DATED: New York, New York
April __, 2025

/s/ Kerry S. Culpepper
Kerry S. Culpepper
CULPEPPER IP, LLC
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawaii 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
E-Mail: kculpepper@culpepperip.com
Attorney for Movie Company Claimant After Productions, LLC

/s/ Stan Twardy, Jr.
Stan Twardy, Jr.
DAY PITNEY LLP
225 Asylum Street
Hartford, CT 06103
Tel: (860) 275-0565
Fax: (860) 331-8913
E-mail: satwardy@daypitney.com
Attorney for Debtor Frontier Communications Corporation

SO ORDERED:

Dated: New York, New York
April __, 2025

Chief Judge Martin Glenn
United States Bankruptcy Judge